

## EXHIBIT 2

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

**CARMEN AUTO SALES III, INC.,**  
a Michigan corporation,

Case No. 16-12980  
Hon. Laurie J. Michaelson  
David R. Grand

Plaintiff,

v

**CITY OF DETROIT**, a Michigan municipal  
corporation, **GENE'S TOWING**, a Michigan corporation,  
**B & G TOWING**, a Michigan Limited Liability Company, **JONATHON**  
**D. PARNELL**, a sergeant in the Detroit Police Department,  
and **JEFF BOU**, an individual working for the City of Detroit,

Defendants.

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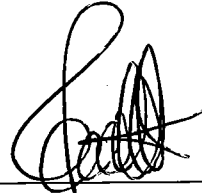
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**AFFIDAVIT OF PAUL OTT**

PAUL OTT, being duly sworn, states:

1. My name is Paul Ott and I make this affidavit based upon my personal knowledge. If sworn as a witness I can competently testify to the facts that I state in this affidavit.
2. I am the President and owner of Gene's Towing, Inc.
3. Gene's Towing, Inc. is authorized by the City of Detroit Police Department to performing towing services at the direction of the City of Detroit Police Department.
4. On May 11, 2016, I was contacted by Jonathan Parnell from the Detroit Police Department, wherein he requested the towing services of Gene's Towing, Inc, to remove vehicles located at 9814 Bryden / 10551 Grand River, at the direction of the Detroit Police Department.
5. Mr. Parnell indicated that there were an extensive number of vehicles to move. Therefore, I contacted B&G Towing, LLC and Boulevard & Trumbull Towing, Inc. to provided additional tow trucks, as my company would not be able to remove all of the vehicles in question in a very timely manner.
6. Upon receiving the requested, I instructed my employees to proceed to the location in question and remove the vehicles located there, pursuant to the direction of the Detroit Police Department.

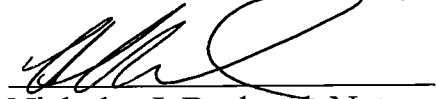
7. The vehicles that were removed from the location at 9814 Bryden / 10551 Grand River were towed back to the impound lot located at 7900 Dix Rd. The other tow companies transported the vehicles they towed back to their respective impound lots.
8. Mr. Parnell indicated that the vehicles were not "on hold" for evidentiary purposes, and could be released to the proper vehicle owner, pursuant to standard practices for releasing impounded vehicles.
9. The vehicles that were removed were deemed abandoned and eventually processed through public auction, conducted by the Detroit Police Department, on July 19, 2016.
10. All of the towing and impound services were provided pursuant to the Michigan Abandoned Vehicle Statute.



Paul Ott

Dated: 7-27-17

Sworn to before me on July 27, 2017 by Paul Ott,



Nicholas J. Bachand, Notary Public  
Wayne County, Michigan  
My commission expires: 1/10/2020

